

NYNEX Government Affairs
1300 I Street NW Suite 400 West Washington DC 20005
202 336 7911

G R Evans
Vice President
Federal Regulatory Affairs

DATE OR LATE FILED

NYNEX

March 1, 1996

Ex Parte

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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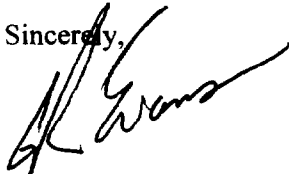
RE: CC Docket 95-116; CC Docket No. 95-185; CC Docket No 94-54

Dear Mr. Caton:

Yesterday, Mr. T. Tauke, Mr. F. Gumper, Ms. D Haraldson and Mr. W. Allan and I, representing NYNEX, met with Chairman Hundt, Mr. J. Nakahata, Mr. J. Farrell, Mr. D. Gips, Ms. R. Keeney, Mr. R. Metzger, and Mr. D. Ellen. The purpose of the meeting was to discuss general issues relating to implementation of the Telecommunications Act of 1996. During the discussion, the NYNEX representatives reviewed NYNEX's position in the above-captioned proceeding on Number Portability and stated that for purposes of implementing the legislation, the FCC should allow interim number portability arrangements. NYNEX expressed the view that it was premature to make a decision on the appropriate technology for long term number portability at this time. The attached material was used in the discussion.

The NYNEX representatives also discussed various methods of reciprocal compensation for interconnecting local exchange carriers, including CMRS providers. NYNEX representatives expressed the opinion that CMRS providers fell under Section 251 of the Act and, therefore, issues of reciprocal compensation should be left to the carrier negotiation process.

Sincerely,



Attachment

cc: Chairman Hundt
D. Ellen
J. Farrell
D. Gips
R. Keeney
J. Nakahata
R. Metzger

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NYNEX Corporation

INTERCONNECTION : NUMBER PORTABILITY

● PRINCIPLES:

- » Act prescribes service number portability
- » Act permits interim number portability

● INTERIM NUMBER PORTABILITY

» RECOMMENDATIONS:

- FCC should recognize workable interim solutions (RCF and DID) and not preclude other technologies
- Negotiations/state mediation and arbitration; preempt where required under Section 253
- FCC should require interim solutions in place and available within 90 days of completion of this rulemaking

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INTERCONNECTION : NUMBER PORTABILITY STATUS

STATE	TYPE
NEW YORK	NYNEX: DID & RCF ROCHESTER: DID & RCF
MASSACHUSETTS	RCF & DID
CALIFORNIA	RCF & DID
WASHINGTON	RCF & DID
CONNECTICUT	RCF & DID
MICHIGAN	RCF & DID
ILLINOIS	RCF & DID
MARYLAND	RCF & DID

INTERCONNECTION : NUMBER PORTABILITY (cont'd)

- **LONG TERM NUMBER PORTABILITY
RECOMMENDATIONS:**

- » Establish firm schedule for rulemaking using existing proceeding
- » ATIS Industry group should address solution and implementation timeframe